
**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF UTAH, CENTRAL DIVISION**

Russell Greer,
Plaintiff,

v.

Joshua Moon and Kiwi Farms,
Defendants.

**PLAINTIFF’S
SUPPLEMENTAL BRIEF IN
SUPPORT OF PLAINTIFF’S
MOTION FOR
PRELIMINARY
INJUNCTION AND
PLAINTIFF’S COMPLAINT**

Case No. 2:20-cv-00647

Judge Tena Campbell

Magistrate Judge Jared C Bennett

Pursuant to *FRCP 15(D)*, Plaintiff files this Supplemental Brief, in response to recent events.

INTRODUCTION

As explained in Plaintiff’s previously filed pleadings, he has suffered systematic harassment at the hands of Kiwi Farms. Plaintiff has demonstrated that even Defendant Moon has participated in the harassment by taunting Plaintiff through email about fair use and refusing to remove Greer’s intellectual property. This pattern of harassment has caused many people to end their lives and has resulted in ANOTHER death of a person named Dave, who went by the online aliases of “Near” and “Byuu”. Dave’s death happened in June 2021. Greer feels this information is important for this Court because it throws a wrench in Defendants’ arguments that their website benefits the public. The website only benefits the anonymous users who make it a sport to target those who are perceived to be different.

Greer also wishes to disclose to this Court the undisclosed relationship between Defendants' Counsel and Plaintiff. Such a disclosure is important because it is really the only reason a civil attorney would stand by an infamous site that is causing people to kill themselves.

The June 2021 Suicide

Many outlets reported in late June 2021 that a programmer named David Kirk Ginder, who went by the online name of Near and Byuu, ended their own life. David preferred to be referred to as "they" and so Plaintiff is referring to David as his proper pronoun. David's last online post attributed their anguish to Kiwi Farms, writing, "It's escalated from attacking me for being autistic to attacking and doxing my friends, and trying to suicide bait another, just to get a reaction from me," Ginder wrote. "The internet is not a game. It's real life. I'm a real person. This stuff really hurts." *'The Internet Is Not A Game...This Stuff Really Hurts.'* *Respected Developer who was Bullied Online Dies By Suicide.* USA Today.

(<https://www.google.com/amp/s/news.yahoo.com/amphtml/respected-developer-died-suicide-experts-165758039.html>).

Moon tried downplaying his site's involvement in Ginder's death, even though Ginder specifically called out Kiwi Farms. USA TODAY found a number of posts on Kiwi Farms attacking Ginder and calling them derogatory slurs. After news of their suicide, one user posted, "This loser better have an after party where his family dances over his corpse." *Id.* From the article, one of Ginder's friends said: "I'm very very angry – furious with Kiwi Farms," Beckett told USA TODAY. "I just want them to appreciate the gravity of what they've done. They certainly contributed to (Ginder's) death. ... They were quite precious to us. How do you replace the irreplaceable?" *Id. EXHIBIT B.*

Deny as Defendant might, why is it that the pattern is the same: unfortunate person gets put on Kiwi Farms, gets relentlessly harassed and then kills themselves because it's too much to bear?

It's all documented on news sites that link Kiwi Farms to the harassment. Plaintiff has certainly felt the same low. Those close to Greer have concluded that Moon must be mentally ill (and that his users are miserable people) because no normal person would continue to run a site that has a reputation of driving people to suicide.

In the same article, Moon claims the "users on this website are ordinary people who want to watch the trash TV of the Internet. With limited exception ... there is no desire to see people harmed." *Id.* This statement reeks of hypocrisy and inaccuracy. Again, normal people don't stalk and torment others for fun. Greer has demonstrated how Moon's users have openly called to harm him by stealing his intellectual property and harassing those close to him. There was a time when Greer's family were screening their calls because the Kiwi Farms users would harass anyone close to Greer.

Also, Mr. Moon has quite the trashy history himself: from saying he wishes Muslims were exterminated to saying he wanted to wear the fingers of Jews as a necklace to making rape threats against people. *The Net Is Closing In and YouTube Had Better Take Notice*. Sam Ambreen Wordpress. (<https://samambreen.wordpress.com/2019/08/27/the-net-is-closing-in-and-youtube-had-better-take-notice/>) (although blogs are subjective writings that shouldn't normally be considered, in this case, they are relevant because they are the writings of a person who has been affected by Kiwi Farms). EXHIBIT A. Maybe Moon has changed his views, and Greer isn't trying to be argumentative, but the point is: Moon and his users have quite the history of being trashy, that they have no right to be harassing others for perceived trashiness.

This also brings to light the second point of information Greer wanted to share with this Court: the relationship between the Skordas firm and Greer.

PAST HISTORY WITH THE SKORDAS FIRM

It is no coincidence that Moon retained the Skordas firm to represent him. Since Kiwi Farms stalks Greer, they have gathered everything about Plaintiff and thus they would know that Mr.

Greg Skordas and Mr. Greer have had past entanglements. These entanglements start back to 2016. When Greer sued Swift for his ill-fated publicity stunt (which was predicated on the legal concept of vicarious liability. Swift's agents were negligent in passing on a gift and so trying to get publicity, he faked sued her to get her attention and it backfired on him and attracted Kiwi Farms), Swift's team retained Greg Skordas. Greer was being a shock jock back then (a la Howard Stern) and so he teasingly made jokes about Skordas on his social media that Skordas apparently took very personally.

The following year, Greer went to a concert in SLC and was man-handled and discriminated by the security of Ariana Grande. Greer also met Ariana at a before-show meet and greet and she was very discriminating against Greer (was very unkind to him because of his facial disability and appearance). But because Greer was still facing heat for the Swift incident, Greer lied and said that the concert was fun, when deep down, he was deeply hurt and had written Grande's manager for an apology, but he didn't want to cause drama. That's all he wanted was an apology. The manager, Stephanie Simon, referred Greer to Scooter Braun, Grande's then new manager (whom she has subsequently fired). Greer unsuccessfully got through to Scooter and so Greer researched and found a Utah law (Utah Code 62A-5b-103) that makes it illegal to deny a disabled person rights in a place of entertainment.

Greer filed a small claims suit against Grande based on a violation of that law. Skordas had the audacity at the small claims trial to openly call Greer not disabled, when in fact, federal law defines a disability as one or more ailments that limits an essential activity. Being born with a facial disability and having people understand every other word that is spoken in a slurred "accent" is most definitely a disability. Moon's users have so callously lobbed discriminatory names against Greer for his disability. Greer was fuming when Skordas berated him openly like that. Skordas was awarded attorney fees and waited a year to even collect by sending an officer to Greer's house with court documents.

No activity really transpired between Greer and Skordas until 2020 when Skordas represented the mentally ill girl in the very unfair misdemeanor case against Greer. The same case that is the subject of the false light claims. Once again, Mr. Skordas in that case fought very ferociously against Greer. Even though no threats or serious harassment was made against the alleged victim (it could be argued that Moon and his users have harassed Greer more than Greer ever harassed the girl, yet Greer is somehow the convicted one), Skordas went straight for the jugular and got the prosecutor to file charges against Greer, instead of first trying to get a restraining order or simply contacting Greer to ask him to stop, which Greer would have gladly complied and which he wasn't really even contacting the alleged victim that much. Greer was frankly surprised he was charged because he didn't think he committed a crime and he still maintains his innocence. He was only convicted because of his advocating for sex work (he has the email from the prosecutor to prove it), not for any actual harassment. So in reality: Greer was convicted for having unpopular views, which is unconstitutional and Greer tried appealing, but him and his criminal attorney got in a verbal altercation about the ramifications of appealing.

Greer goes to such lengths to explain this entire history to show that there is a very long and complicated history between Defendants' counsel and him, and to offer the evidence that this current representation is being made for nothing more than to harass and intimidate Greer. Why else would a law firm represent a person who runs a website that is tied to many suicides and harassment? Civil law is not criminal law and thus there is no utmost, constitutional duty to represent defendant. The Skordas firm can withdraw at any time, embarrassed to be tied to such a website, but they refuse and instead, downplay the suicides and the harm of Kiwi Farms. It seems ironic for the firm to accuse Greer in his criminal case to be a horrible person for very minor actions, but downplay worse actions by Defendants.

Per *FRCP 11 (B)*, an attorney certifies that the representation is not being used to harass. That's what's exactly happening here. The Skordas firm has gleefully taken on anybody who

approaches them for help in any situation regarding Russell Greer the Plaintiff. How is that not improper or harassing? If it's not harassing, then does the Skordas firm take on ANY person who approaches their firm? Surely, they don't. Do they have intake criteria? Do they have an annual quota of clients? If it's not harassing, does the firm ever reject anybody? Have they ever rejected anybody who approached them about Plaintiff?

And most importantly: did the firm bother to do ANY research on defendants? This representation is a slap in the face to Greer and a slap in the face to every victim of Kiwi Farms (both dead and alive) and it only furthers that this representation is being used for an improper purpose to harass Greer because Mr. Skordas has some vendetta against Greer that began 6 years ago because there is no other reason any law firm would represent Kiwi Farms in a civil case where they aren't constitutionally obligated to. Those close to Greer believe Mr. Skordas is only representing Moon out of spite towards Greer and this is clearly a violation of Rule 11 B.

Greer isn't asking this Court for sanctions. Rather, he is only pointing out a history of litigation history between himself and Skordas to help show that contempt and harassment seems to be the only driving motivation factors in representing a site like Moon's. Greer leaves it up to the Court whether the Court wishes to issue sanctions against the Skordas firm.

CONCLUSION

Plaintiff urges the Court to ponder this new information because it helps show that people are suffering for Defendants' "entertainment". It is Plaintiff's hope that this Court entertains Defendants with an injunction. It is requested that the sought for monetary amount is rewarded to Plaintiff and that Defendant is entertained paying Greer for damages. It is hoped that maybe when Moon actually faces legal consequences with this case; that when he starts feeling the same stress and despair that his victims have faced, that maybe a light will turn on in his head. Judgements are meant to deter the behavior Kiwi Farms and Moon have exhibited. It is hoped that the judgement is

awarded Greer.

Respectfully submitted,

Dated: 08/05/2021

A handwritten signature in black ink, appearing to be 'R Greer', with a stylized, wavy line extending from the end.

/s/ Russell Greer

Russell Greer

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CERTIFICATE OF SERVICE

An electronic copy of the Motion for Leave to File Supplemental Brief has been sent to the following attorneys, Greg Skordas, via the court electronic filing system.

EXHIBIT A

Verizon LTE 3:46 AM 54%
Not Secure — matthewhopkinsnews.com

up at her home or those of other family members?




— In this tweet, Moon calls for genocide (his word) for Muslims. Click for full size.

What if one or more of Moon's many enemies posted his tweets and address on some extremist Islamic website?

Regardless, although Dynastia and Moon can be crass they can also be subtle. In this [archived Kiwi Farms thread](#), Dynastia posts a great deal of accurate information and sophisticated terminology about Muslims. Of course Dynastia


Verizon LTE 3:46 AM 54%
Not Secure — matthewhopkinsnews.com

 **Joshua 'Null' Moon**
@KiwiNull [Follow](#)

[@PaulTown_](#) [@TheRalphRetort](#) Cut off jew fingers.
11:58 am - 27 Aug 2016


— Joshua Moon espouses the merits of mutilating Jews. Click for full size.

Only two weeks before the threat to go on a slashing spree against babies in Wales, Moon was on Twitter using his official account to talk about mutilating Jews [here](#) (archive [here](#)). Moon went on to [contact actual Jewish people to specifically threaten their fingers](#) (archive [here](#)) –

 **Joshua 'Null' Moon**
@KiwiNull [Follow](#)

Sir, I don't mean to be a bother, but would you happen to have any extra fingers left for my necklace? Toes maybe?

Joe Bernstein @Bernstein
.@twitter: definitely the best social network for getting threatened to have you fingers cut off to add to a necklace of jewish fingers

LIKE 1 

7:51 am - 27 Aug 2016

— Joshua Moon enhances his

EXHIBIT B





